Remarks

Applicants respectfully request reconsideration of this application. Claims 1-4, 8-13, 16, 19-20, 22-24, 26-27, 29 and 30 have been amended. Claim 18 has been canceled. Claim 31 has been added.

In the specification, the paragraph on page 3, starting on line 4, has been amended to delete a repeating sentence.

The amendments to the claims are made only to place the claims in what Applicants consider to be better form and not in response to the rejections. Applicants do not believe any amendment was needed to overcome the rejections or otherwise to comply with any requirement of patentability.

Objections

Examiner objected to claim 18 as being dependent upon a rejected base claim, but would be allowable if rewritten in independent form including all of the limitations of the base claim and any intervening claims. Applicants have written the limitations of claim 18 and base claim 1 as new claim 31 and canceled claim 18. Applicants submit that new claim 31 is in condition for allowance.

Rejections Under 35 U.S.C. § 102

Claims 1-17 and 19-30 were rejected under 35 U.S.C. 102(e) as being anticipated by *Conklin* et al., U.S. Patent No. 6,415,283 ("*Conklin*"). Applicants respectfully submit that the present claims are patentable over *Conklin*. The cited reference does not disclose or suggest all of the elements of the Applicants' claims.

Specifically, independent claim 1 recites a method of generating a knowledge neighborhood, which includes (among other operations): selecting a set of knowledge profiles which contain a root concept; and determining a set of knowledge neighbors for the root concept, wherein each knowledge neighbor is a concept represented by one or

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more terms that are common among the knowledge profiles in the set of knowledge profiles.

Independent claims 19 and 26 also each include limitations similar to these. Applicants submit that *Conklin* does not disclose or suggest these limitations.

First, Conklin does not disclose or suggest selecting a set of knowledge profiles which contain a root concept. Examiner suggests that the attribute set of *Conklin* is the set of knowledge profiles of claims 1, 19 and 26. (Office Action, Nov. 29, 2004, p. 2). Examiner also suggests that the node of *Conklin*, e.g. Node A, is an example of the root concept of claims 1, 19 and 26. *Id.* However, the attribute set of *Conklin* does not contain a node (allegedly the "root concept"). Rather, the attribute set of *Conklin* is predetermined and then mapped to various nodes. Specifically, the tree structure comprises a plurality of nodes, wherein each node includes an attribute. The attributes do not include a node. Hence, Conklin does not disclose or suggest selecting a set of knowledge profiles which contain a root concept.

Second, *Conklin* does not disclose or suggest determining a set of knowledge neighbors for the root concept, wherein each knowledge neighbor is a concept represented by one or more terms that are common among the knowledge profiles in the set of knowledge profiles. Rather, *Conklin* discloses mapping attributes in a set of attributes to nodes in a tree structure. (*Conklin*, col. 3, lines 66-67). Examiner suggests that Node B-Node F in Figure 2 of *Conklin* can be the knowledge neighbors of claim 1 for the root concept Node A. (Office Action, Nov. 29, 2004, p. 3). Examiner further suggests that Attribute$_1$ – Attribute$_9$ can be the knowledge profiles of claim 1. (Office Action, Nov. 29, 2004, p. 2). However, Node B-Node F cannot be knowledge neighbors for Node A. Node B-Node F are not concepts represented by one or more terms that are common among Attribute$_1$ – Attribute$_9$ (or the knowledge profiles), as would be required by claim 1. Specifically, neither the attribute names nor values are terms common among Attribute$_1$ – Attribute$_9$ (allegedly the "knowledge profiles") that represent Node B-Node F (allegedly the "concepts").

As seen in Figure 2 of *Conklin*, attribute names are not common among Attribute$_1$ – Attribute$_9$. Rather, in *Conklin*, attribute names are compared with node names to

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identify matches. (*Conklin*, col. 4, lines 17-19). Additionally, as seen in Figure 2 of *Conklin*, attribute values do not represent Node B-Node F. Rather, the value provides a quantitative measure for the attribute. (*Conklin*, col. 2, lines 37-38). Therefore, Node B-Node F are not concepts represented by one or more terms that are common among Examiner's knowledge profiles (Attribute$_1$ – Attribute$_9$). Accordingly, Node B-Node F cannot be the knowledge neighbors of claim 1.

Therefore, *Conklin* does not disclose or suggest determining a plurality of knowledge neighbors for the root concept, wherein each of the knowledge neighbors is a concept represented by one or more terms that are common among the knowledge profiles in the set of knowledge profiles, as required by Applicants' claims.

Therefore, *Conklin* fails to teach or suggest all of the limitations of Applicants' claims. Accordingly, *Conklin* does not anticipate independent claims 1, 19 and 26. Claims 2-17, 20-25 and 27-30 have either been canceled or depend, directly or indirectly, from one of the foregoing independent claims. Therefore, *Conklin* fails to anticipate claims 2-17, 20-25 and 27-30 for at least the reasons discussed above with respect to claims 1, 19 and 26. Withdrawal of the rejection is respectfully requested.

Request for Examiner Initials

Applicants request that the Examiner initial the cited document on pages 1-3 of Form PTO-1449 submitted with an Information Disclosure Statement filed March 7, 2001 in the present application and return a photocopy of that initialed Form PTO-1449 to Applicants. Applicants request the Examiner's initials in order to show consideration of the cited references.

A photocopy of the previously-submitted Form PTO-1449 is included herewith without copies of the previously submitted references.

Request for Entrance of Previously Submitted
Request to Approve Drawing Changes and Preliminary Amendment

Applicants submitted, on October 7, 2002, a Request to Approve Drawing Changes and a Preliminary Amendment to correct typographical errors in the specification. The Office Action of November 29, 2004 did not indicate that the Examiner considered the Preliminary Amendment and Request to Approve Drawing Changes. Applicants respectfully request Examiner consider and enter the previously submitted Preliminary Amendment and Request to Approve Drawing Changes. A photocopy of the previously submitted Preliminary Amendment and Request to Approve Drawing Changes is included herewith.
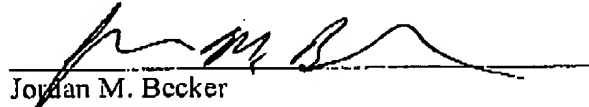
Conclusion

Applicants respectfully submit the present application is in condition for allowance. If the Examiner believes a telephone conference would expedite or assist in the allowance of the present application, the Examiner is invited to call Jordan Becker at (408) 720-8300.

Pursuant to 37 C.F.R. 1.136(a)(3), Applicants hereby request and authorize the U.S. Patent and Trademark Office to (1) treat any concurrent or future reply that requires a petition for extension of time as incorporating a petition for extension of time for the appropriate length of time and (2) charge all required fees, including extension of time fees and fees under 37 C.F.R. 1.16 and 1.17, to Deposit Account No. 02-2666.

Respectfully submitted,

BLAKELY, SOKOLOFF, TAYLOR & ZAFMAN LLP

Date: 2/28/05

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